1. 2013 Dust Sampling Descriptions

1.1. Property 129

Interior dust sampling was performed at Property 129 on April 25, 2013 by Louis Berger and ARCADIS – Malcolm Pirnie personnel. A total of two interior dust samples (CDE-OU1-ID-2013-129-01 and CDE-OU1-ID-2013-129-02) were collected at Property 129 using the procedures described in Section 3 of the Final Data Characterization Report for Phase 2 OU1 Soil and Interior Dust Sampling (April 2012). Both samples were analyzed for PCB Aroclors. Analytical results indicate that Total PCBs were detected in both interior dust samples for this property. The results for one of the samples (CDE-OU1-ID-2013-129-02) exceeded the ROD criterion for Total PCBs of 1 ppm, while the results for the other sample (CDE-OU1-ID-2013-129-01) did not:

- CDE-OU1-ID-2013-129-01 (0.77 ppm) and
- CDE-OU1-ID-2013-129-02 (1.31 ppm).

The material for sample 01 was collected from the first floor of the home. The field team noted that the first floor was carpeted, and that the corners of the living room were very dusty. There was no access to the downstairs two bedrooms. Specific areas vacuumed include the living room, hallway, kitchen, and the side entrance off of the kitchen.

The material for sample 02 was collected from the second floor of the dwelling. The field team noted that the second floor was also carpeted, that the home was very dusty in low-traffic areas (*e.g.,* the edges of the stairs and the edges of rooms). Specific areas vacuumed include the upstairs bedroom and hallway, as well as the tops of books, shelves, and along the edges of the walls and stairs to the second floor.

The data were produced by TestAmerica Burlington and validated by an ARCADIS-Malcolm Pirnie validator following USEPA Region II validation procedures.

1.2. Property 307

1.2.1. Initial Sampling – July 2011

Interior dust sampling was performed at Property 307 on July 11, 2011 by Malcolm Pirnie personnel. A total of 2 interior dust samples (CDE-OU1-ID-307-01A and CDEOU1-ID-307- 01B) were collected at Property 307 using the procedures described in Section 3.0. Both samples were analyzed for PCB Aroclors. Analytical results indicate that Total PCBs were detected in both interior dust samples for this property. The results for the following 2 interior dust samples exceeded the ROD criterion for Total PCBs of 1.0 ppm:

- CDE-OU1-ID-307-01A (103.000 ppm), and
- CDE-OU1-ID-307-01B (5.200 ppm).

The data were produced and validated by CLP following EPA Region II validation procedures.

The field team noted that significant quantities of dust were present behind the bookshelf and religious shrine in the living room as well as along the baseboard heaters; the team also noted that the area behind the dressers in the finished attic bedroom were also very dusty.

Material for Sample 01A was obtained from the kitchen and the living room, and material for Sample 01B was obtained from the finished attic bedroom, stairway, mini blinds, and behind the dressers.

The data was produced and validated by CLP following EPA Region II validation procedures. These procedures compare the data to the CLP criteria for evaluation of accuracy and precision. Since the CLP does not receive the field notes, they are not able to fully evaluate the representativeness of the sample. Per the ROD, dust samples are designed to identify homeowner exposure to PCB-laden dust. The field sampling team had to take extraordinary measures to collect enough dust (such as from behind a religious shrine) in order to meet CLP volume requirements, measures that may be considered above and beyond those specified in the sampling plan. Even through these efforts, the dust sample was still not sufficient to provide the laboratory with the required mass; this sample therefore may not be considered representative of typical homeowner exposure. Note that the lack of dust in the frequented spaces (e.g., living room, dining room, bedrooms, etc.) of this property is the best indicator of the absence of an exposure. Confirmatory sampling should be pursued at this property, with dust collected from frequented areas of the house only. In light of the first sampling effort, the lack of sufficient sample mass should be considered representative of the actual homeowner exposure. That is, if a sample cannot be collected, there is not an exposure to PCB-laden dust.

1.2.2. Confirmatory Sampling – April 2013

Interior dust sampling was performed for the second time at Property 307 on April 26, 2013 by Louis Berger and Malcolm Pirnie personnel. During this second sampling event, a total of two interior dust samples (CDE-OU1-ID-2013-307-01 and CDE-OU1-ID-2013-307-02) were collected at Property 307 using the procedures described in Section 3 of the Final Data Characterization Report for Phase 2 OU1 Soil and Interior Dust Sampling (April 2012). Both samples were analyzed for PCB Aroclors. Analytical results indicate that Total PCBs were detected in both interior dust samples for this property, and that both Total PCB concentrations exceeded the ROD criterion for Total PCBs of 1 ppm:

- CDE-OU1-ID-2013-307-01 (106 ppm) and
- CDE-OU1-ID-2013-307-02 (4.1 ppm).

The home was unoccupied during the 2013 sampling, and the field crew noted the presence of large quantities of dust on both the first and second floor. Material for sample 01 was obtained from the downstairs of the house. Areas vacuumed include the living room, two bedrooms, and the hallway. The material for sample 02 was collected from the second floor of the home. Areas vacuumed include the stairs, a third bedroom, and a den/TV room.

The data were produced by TestAmerica Burlington and validated by an ARCADIS-Malcolm Pirnie validator following USEPA Region II validation procedures.